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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$11,000.00 IN
U.S. CURRENCY,

15
16 Defendant.

2:22-MC-00156-WBS-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant Alana
19 Wynne (“claimant”), by and through their respective counsel, as follows:

20 1. On or about February 16, 2022, claimant filed a claim in the administrative forfeiture
21 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
22 \$11,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on November 30, 2021.

23 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
24 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
25 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a
26 claim to the defendant currency as required by law in the administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline is May 17, 2022.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to July
5 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
7 forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
10 alleging that the defendant currency is subject to forfeiture shall be extended to July 15, 2022.

11
12 Dated: 05/16/22

PHILLIP A. TALBERT
United States Attorney

13
14 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney


15
16
17 Dated: 05/16/22

/s/ Bruce Rivers
BRUCE RIVERS
Attorney for potential claimant
Alana Wynne
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(Signature authorized by email)

23
24 **IT IS SO ORDERED.**

25 Dated: May 17, 2022

26 
WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE